



Consumer Electronics Association

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September 1, 2005

VIA ECFS

Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, D.C. 20554

Re: *Ex Parte* Communications in ET Docket 05-24

Dear Ms. Dortch:

This is to notify you that on August 31, 2005, Robert Schwartz, McDermott Will & Emery and counsel to the Consumer Electronics Retailers Coalition ("CERC"), and the undersigned met with Bruce Franca, Acting Chief of the Office of Engineering and Technology.

Our meeting pertained to the Commission's Further Notice of Proposed Rulemaking ("FNPRM") regarding requirements for digital television receiving capability. On behalf of CEA, CERC, and their members, we reviewed the points made in the CEA and CERC comments and reply comments in this proceeding. Specifically, we urged that there is insufficient basis for the Commission to depart from the existing July 1, 2007 date pertaining to TV receivers with screen sizes of 13 to 24 inches. This date has been relied upon in the product and resource planning of manufacturers and in the merchandising and marketing plans of retailers. A change in the date to any earlier than March 1, 2007 not only would be unwarranted, it also would be infeasible for the general population of TV receiver manufacturers, who require a minimum of 18 to 24 months to plan, develop, and deploy new equipment.

In answer to the question posed in the FNPRM, therefore, the record reflects that there would not be sufficient basis for a movement of the 2007 date to a date of December 31, 2006 or earlier. Rather, the record compiled in answer to the question posed would support a movement to a date no earlier than March 1, 2007. All interested parties are on notice of the fact that the FCC could maintain a date as late as the existing date of July 1, 2007, or as early as the dates discussed in the FNPRM (or an interim date as supported by the record).

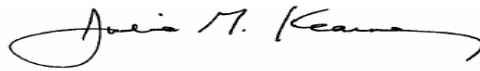
With respect to new receivers with screen sizes less than 13 inches, CEA and CERC believe that experience is necessary with the small chassis products that currently *are* subject

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to the Commission's tuner requirements before the feasibility can be determined regarding the inclusion of digital tuners in some of these products, which may be radically smaller and less expensive. At present, it appears that the cost and development burdens on manufacturers, and the impact on consumers, would outweigh any possible benefits.

This letter is being provided to your office in accordance with Section 1.1206 of the Federal Communications Commission rules. A copy of this letter has been delivered by e-mail to the meeting participants.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Julie M. Kearney", with a long, sweeping horizontal line extending to the right.

Julie M. Kearney
Senior Director and Regulatory Counsel

cc: Bruce Franca